CONSIDERATION OF 30-DAY NOTICE FOR COMMENTS
TENNESSEE PASS PROJECT
SAN ISABEL AND WHITE RIVER NATIONAL FORESTS

The 30-day notice and comment period was conducted from December 19, 2013 to January 21, 2014. A total of 16 comment letters were received. Below are the consideration of comments received during this 30-day period.

Index of Letters:

Letter No.	Author	Organization	Date
12	Aragon, James	CPW	2014.01.20
2	Artley, Dick		2014.01.03
7	Bangert, Randy	HSTC	2014.01.15
5	Brink, John		2014.01.11
6	Colville, Douglas		2014.01.05
9	Conway, Greg	Sylvan Lakes Metro District	2014.01.16
14	Johnson, Sara; Garrity, Mike	Native Ecosystem Council; Alliance for the Wild Rockies	2014.01.21
4	Martinez, Teresa Ana	CDTC	2014.01.03
15	Mellgren, John	WELC, QUC, Wild Earth Guardians	2014.01.21
8	Miller, Janene		2014.01.15
10	Petrenas, James		2014.01.13
11	Smith, Rocky		2014.01.17
16	Sobel, Tom	QUC	2014.01.21
1	Willis, Jason	TU	2013.12.19
3	Wolf, James	CDTS	2014.01.04
13	Zadra, Dennis		2014.01.20

CDTC = Continental Divide Trail Coalition
CDTS = Continental Divide Trail Society
CPW = Colorado Parks and Wildlife
HSTC = Home Stake Trout Club
QUC = Quiet Use Coalition
TU = Trout Unlimited
WELC = Western Environmental Law Center

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
J.Aragon1	Colorado Parks and Wildlife (CPW) is supportive of your objectives as outlined in the draft environmental assessment. Treatments as described for lodge pole pine, aspen, spruce/fir and meadows and sagebrush areas should show benefits for a variety of wildlife species which occur in the area, while promoting forest health and vigor.	Supportive comment.	Chapter 2, Alternative 1
J.Aragon2	Often the only season to access the stream is in late summer and early fall (August through October). Brown and brook trout starts in late August and eggs are incubating through the fall into late spring, just before runoff begins. Work may not be able to avoid spawning and incubation periods. Wording may be changed so work can occur from late July through October, e.g. best management practices will be incorporated to minimize disturbance and sedimentation to spawning fish and incubating eggs.	This comment has been noted and the fisheries biologist has reviewed the information. Design criteria in the Final EA has been modified.	Fisheries
J.Aragon3	Halfmoon Creek currently contains self-sustaining populations of brown trout and brook trout. Rainbow trout have been stocked recently but are not yet self-sustaining.	This comment has been noted. An addendum was written in February 2014 to the Fisheries BE (located in the Project Record) to include the information. This information was added into the EA Ch 3 Fisheries section.	Fisheries
J.Aragon4	Table 3.18 should be updated to contain the following information. Halfmoon Creek contains brown, brook and rainbow trout. The East Fork of the Arkansas has brown and brook trout. Tennessee Creek has brown and brook trout. Species listed in the lakes are correct. Turquoise Lake has also been historically stocked with fingerling lake trout.	This comment has been noted. An addendum was written in February 2014 to the Fisheries BE (located in the Project Record) to include the information. This information was added into the EA Ch 3 Fisheries section.	Fisheries
J.Aragon5	The EA states for Halfmoon Creek that “overall the stream is in good shape”. The stream shows signs (high sediment, inadequate pools) of disturbance and low habitat diversity. This is better explained on pgs 114-115.	This comment has been noted. The Final EA was modified to correct the conflicting information.	Fisheries
J.Aragon6	Page 33, #18 a cover buffer should be maintained or allowed to develop on all roads scheduled to remain open post project throughout the project area. This hiding cover should hide 90% of an adult deer or elk from view in 200 feet or less.	Design Criteria #18 complies with the forest plan standards and guidelines for hiding cover along forest roads.	Wildlife
J.Aragon7	Page 33, #19, page 34, #20, 21 the seasonal restriction of December 1 to April 15 for activities within winter range is good but may need to have some flexibility built into it recognizing varying weather conditions.	It is recognized that having flexible restriction dates could add additional protection for big game in years of early and late snows. Typically the restriction dates of Dec. 1st - April 15th are appropriate for wintering big game. Having concrete	Wildlife

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		dates facilitates compliance with contractors/permittees and the contracts they abide by.	
J.Aragon8	Winter range mapped on Mt. Zion is the only designated winter range in the project area. Winter work on up to 375 acres may be unnecessarily disruptive to wintering big game populations.	If seasonal restrictions (design criteria) listed for other important species (i.e. goshawk) are in place as well as winter restrictions for big game, it would limit implementation to 2.5 months in the fall. This is not enough time to feasibly get the work done to meet the purpose and need.	Wildlife
D.Artley1	The Tennessee Creek timber sale is inconsistent with best science. The USFS is mandated by law to base their projects on best science. Please see Attachment #15.	The best available science was used to develop the purpose and need, proposed action, and to perform the effects analysis in the EA. A literature cited section is available in the EA. The analysis included a review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information. Several BMPs and design criteria were developed with the consideration of best available science to address the effects of the treatments. The design criteria are available in Ch. 2 of the EA. The quotes and available literature items were reviewed and considered in this analysis. A literature review has been conducted and is included in the project record in response to this comment letter. Factors relevant have been considered in the analysis.	Best Available Science
D.Artley2	In the final EA please explain to the public why a less intrusive, more publically accepted silvicultural prescription was not proposed in place of clearcut. Please tell them why it is essential to regenerate the area. Remember, stands with unhealthy and dead trees are a sign of a healthy, biodiverse forest.	Thinning is proposed on approximately 7,110 acres of lodgepole pine versus 2,370 acres of cleacuts (Draft EA Pg. 15). Clearcutting would establish new age classes of lodgepole pine that are at very low risk of bark beetle infestation for 60-80 years, as well as promote species diversity where the opportunity exists. Clearcutting is the most effective route to rapid and successful regeneration in lodgepole forests (Koch 1996 Pg. 160). Fifteen percent (approximately 1,620 acres) of the lodgepole pine within the project area is in no treatment acres. In addition the thinning	Silviculture

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		prescription calls for 10% of lodgepole pine acres to remain untreated (approximately 700 acres) and areas with dense horizontal cover (greater than 35%) would remain as reserves. Design criteria (Draft EA Pg. 31) specify the minimum number of dead trees to be left across the landscape.	
D.Artley3	The pre-decisional EA does not analyze an alternative in detail that does not construct any new roads (temp or system). The no new roads alternative stands out among the infinite number of alternatives because it reduces the adverse environmental effects of the proposed action while still meeting the purpose and need for the project. Since best science and Chief Dombeck agree that "There are few more irreparable marks we can leave on the land than to build a road," this is a valid reason to analyze a no new temporary or system road alternative in detail. The acres harvested would be reduced slightly, but the alternative would still be responsive to the Purpose & Need and most importantly the road-related natural resource damage will be eliminated.	This alternative would not meet the purpose and need as defined in Ch. 1 of the EA. Forest Service system roads are limited in the project area. Approximately 40 – 50% of the project area would not be accessible if temporary roads were not allowed. (Current road density for the Leadville Ranger District is 0.08 miles of road/sq. mile of district. This is the lowest of all the districts on the San Isabel National Forest.) The creation of temporary road was not raised as an issue during the development of the project. Issues with user conflicts and closing of temporary roads were raised and addressed through design criteria and use of BMPs. The quote from Chief Dombeck was taken out of context. In the remarks from Chief Mike Dombeck, he states that, "Forest roads are an essential part of the transportation system in many rural parts of the country." Chief Dombeck also stated, "For these reasons, I recently proposed development of a new long-term forest road policy based on science. The proposal has four primary objectives. 1) More carefully consider decisions to build new roads. 2) Eliminate old unneeded roads. 3) Upgrade and maintain the roads important to public access. 4) Develop new and dependable funding for forest road management."	NEPA – Alternatives
D.Artley4	New road construction is an activity that causes damage to some important natural resources in the sale area. This activity is particularly detrimental to aquatic and wildlife resources. In the final EA please tell the public why you believe road-related	No new Forest System Roads would be created with this project (Draft EA pg. 25). Temporary roads will be created and the effects analysis is listed in Ch. 3. Design criteria and BMPs are in place to limit the resource damage from roads. Temporary roads will	Resource Effects

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	natural resource damage will not occur on the Tennessee Creek timber sale, or if it will occur, explain why the resource damage is an acceptable tradeoff for P&N goals. Please see Attachment #4.	be closed and rehabilitated when treatments are complete. The quotes and available literature items were reviewed and considered in this analysis. A literature review has been conducted and is included in the project record in response to this comment letter. Factors relevant have been considered in the analysis.	
D.Artley5	There were no recent stream surveys completed. This data is needed to predict whether the streams were subject to major adverse effects when they are monitored after the sale is completed. Before and after data is essential.	Hydrology field observations for the environmental analysis occurred and focused on known stream problems (Halfmoon Creek, Elbert Creek, and East Tennessee Creek) and upland conditions, along system and non-system routes, stream/road crossings, kettle lakes, and in prior clearcuts. Monitoring criteria specific to stream monitoring has been added to the Final EA. Design criteria and BMPs are in place to protect soil, water, riparian and aquatic resources.	Streams
D.Artley6	There is no economic analysis telling the public whether the sale is below cost or not.	The purpose and need of the project includes elements of forest health, fuels reductions and wildlife habitat improvement. The project has not been identified as a timber sale. Though timber sales may be utilized to complete implementation, it is not the only tool. Work may be completed with other means, such as service contracts, long term stewardship contracts, or Forest Service (force account) crews.	Economic Analysis
D.Artley7	Glyphosate kills aquatic life even if the concentrations of the chemical in water are very low. The fish deaths will occur in the streams in the project area and a few miles downstream. Herbicide mist should never be allowed to contact water… even so-called aquatic-safe herbicides. Please see Attachments #9a and #18.	Though the Invasive Species Environmental Assessment (1998) and the 2013 Noxious Weeds Biological Assessment allows for the use of chemicals with glyphosate, the chemicals used within the project area to treat invasive species do not. The chemicals used within the project area include Milestone, Telar and Vanquish.	Herbicides
D.Artley8	Figure 2.1 Map of Alternative 1 (Proposed Action) does not show the proposed cutting units and roads at a large enough scale to be ecologically meaningful to the public.	Within the environmental analysis, specific treatment units were not identified. Instead, the description in the proposed action and design criteria would be used to determine the appropriate	NEPA - Alternatives

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		location for treatment units. Additional maps, that are at a large scale have been included in the appendix of the Final EA.	
D.Artley9	The pre-decisional EA does not discuss how the timber sale's harvest and slash/RX burning activities will be mitigated to assure protected bird species individuals and their habitat are not harmed. Please identify the birds that exist in and near the project area that are protected under the Migratory Bird Treaty Act and discuss how these birds will be protected during burning and timber harvest operations such that there be no *"impact to migratory birds directly, indirectly, and cumulatively through habitat loss, fragmentation, and loss of habitat effectiveness*."	Design criteria (Draft EA pg.31-33) pertain to lessening impacts to birds and their habitats. A list of bird species of concern that are expected to be in the project area has been added as Appendix 1 in the BE (located in the project record) and has been added to the appendix of the Final EA. Though there could be impacts to migratory birds, this project is not expected to have a measurable negative effect on any migratory bird population.	Migratory Birds
D.Artley10	Not obliterating a road because the line-officer will use it again to haul logs from the area means the road is not temporary! Road that will be used again in the future should be constructed to system road standards, or not at all. Since temporary roads are outsloped with no ditch, sediment that is generated during precipitation events, find its way to streams and harms the aquatic resources for decades until the next timber sale reconstructs the so-called "temporary" road. Then the riparian resource cycle of destruction begins again. Please see Attachment #4.	Any roads created under this project would be temporary roads. Temporary roads will be closed and rehabilitated. Rehabilitation would include: blocking the entrances, scattering limbs and brush on the roadbed, re-seeding, adding waterbars, removing fills and culverts, or reestablishing natural drainage patterns. The quotes and available literature items were reviewed and considered in this analysis. A literature review has been conducted and is included in the project record in response to this comment letter. Factors relevant have been considered in the analysis.	Roads
D.Artley11	Please analyze another alternative in detail that educates the public about Dr. Cohen's methods and offers USFS assistance (with landowner approval) to apply the methods on land owned by elderly and handicapped homeowners. Please see Attachments #11 and #3.	Both the USFS and Colorado State Forest Service provide advice to private land owners on fuels mitigation. The USFS is not allowed to work on private lands; Colorado State Forest Service works with private lands owners to determine options available to the land owners to complete work on their lands. An alternative that educates the public about Dr. Cohen's methods and offers USFS assistance is outside the scope of this project. The quotes and available literature items were reviewed and considered in this analysis. A literature	NEPA

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		review has been conducted and is included in the project record in response to this comment letter. Factors relevant have been considered in the analysis.	
D.Artley12	Rangers Conner and Neely, there is no "timber famine" as the USFS has been so fond of predicting for many decades. Please designate the resource damage describe in Attachment #1 that the public appreciates.	The purpose and need of the project includes elements of forest health, fuels reductions and wildlife habitat improvement. The effects have been analyzed in Ch. 3 of the EA. The quotes and available literature items were reviewed and considered in this analysis. A literature review has been conducted and is included in the project record in response to this comment letter. Factors relevant have been considered in the analysis.	Resource Damage
R.Bangert1 D.Colville1	One of its objectives is to create conditions in treated forest stands that are less favorable for the mountain pine beetle (MBP), which will reduce impacts from MPB infestation and lower MPB risk for lodgepole pine forests. However, the scientific understanding of lodgepole pine forests is that given the current MPB epidemic throughout Colorado, it is impractical to expect that silvicultural treatment of lodgepole pine forests will prevent or even impede the advance of MPB epidemic. (Kaufmann, et al 2008)	The purpose and need for the project (Draft EA pg. 9) states, "Create conditions in treated forest stands that are less favorable for mountain pine beetle infestation for the next 20 – 30 years." Sufficient evidence exists that forest management can reduce mortality from bark beetles and create conditions that reduce the susceptibility of stands to infestation (Fettig et. al. 2007). Younger stands of lodgepole pine are less susceptible to MPB infestations for 60 – 80 years (Draft EA pg. 47). The same document referenced (Kaufmann, et al 2008) also states, "*Creating diverse patch ages and sizes (including young patches) and perhaps more mixed-species forests across the landscape may or may not reduce the spread of future mountain pin beetle outbreaks, but it likely would reduce the amount of forest susceptible through time to a monolithic disturbance, including mountain pine beetle attack or fire*." And, "*The effectiveness of such measures cannot be assured, nor are all the ecological consequences known, though even in the current epidemic, stands and patches of younger*	Silviculture

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		lodgepole pine trees appear to have survived the epidemic with no or only limited mortality." Creating diverse patch ages and sizes in part of the proposed action for the project, see Chapter 2 of the draft EA.	
R.Bangert2 D.Colville2	The draft EA also states the Project is needed, in part, to create forest conditions that are more resilient to wildfire, the proposed treatments designed to reduce the potential for crown fire. However, the open, self-pruning crowns of lodgepole pines are less prone to crowning than other species. (Lotan, et al 1985) More importantly, scientific study shows that lodgepole pine forests above 9000 feet elevation have low probability of an intense crown fire because the snow-free period is relatively short, leaving little time for fuels to dry. (Kaufmann, et al 2008) Additionally, crown fire is nearly impossible in the years following needle fall in lodgepole pine forests affected by the MPB. (Kaufmann, et al 2008) Over the long term, forests destroyed by MPB infestations may not be any more likely to burn than healthy forests. (Simard, et al 2011) Thus, the treatments proposed in the draft EA do not appear to have any correlative affect on achieving the intended goal.	The appendix for the Fire and Fuels Specialist Report (located in the project record) contains modeled data for the Crowning Index post treatment (the Crowning Index is defined as the open windspeed at which active crown fire is possible for the specified fire environment). The models show the Crowning Index increases post treatment over the no action alternative. An increase in Crowning Index means that higher windspeeds are needed for an active crown higher to occur. Wildfire at high elevation may be less frequent but they do occur. Studies on fires and climate by Westerling et al. (2006) show an increase in area burned across the western U.S. due to earlier snowmelt, higher temperatures and longer fire season, and these patterns were most pronounced in the northern Rockies and in high-elevation forests (Lowrey, 2007). In June 2012, the Treasure Fire occurred near the Tennessee Creek project boundary. This wildfire was 420 acres and located at 10,500 – 12,000 feet in elevation. This was a high intensity wildfire and burned through the crowns of lodgepole pines and other conifers. In 2013, multiple high elevation fires occurred throughout Colorado including: the West Fork Fire, the Papoose Fire, and Windy Pass Fire in southwest Colorado and the Ox Cart Fire near Poncha Pass, Colorado. The objective, as stated in the Draft EA is to "*reduce the risk of high intensity wildfire through reduction*	Fire

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		in hazardous fuels." Crown fire is high intensity wildfire and is nearly impossible in years following needle fall in lodgepole pine forests affected by the MPB, but the likelihood of high intensity wildfire has not been completely reduced after needle fall. High intensity wildfire may occur as a surface fire. As noted in the same document by Kaufmann, et al 2008, "*Trees killed by mountain pine beetle may remain standing for a number of years, but as they progressively decay and fall to the ground (often aided by wind), the fuel structure changes once again. In this phase (typically 10-20 years or more after death), a large amount of biomass becomes available as fuel within flame heights that can be generated by the fine surface fuels. Some of the biomass is elevated above the ground where it dries out more easily and becomes available to support intense fire with a large release of heat*."	
R.Bangert3 D.Colville3	The draft EA also proposes thinning, clearing and patch cutting as the primary methods to achieve forest conditions that are more resilient to wildfire. However, thinning trees and creating open spaces within the forest may be counterproductive to that goal. Recent science shows that eliminating the canopy cover in lodgepole pine forest lessens cool and moister forest floor conditions thereby increasing the probability of fuel ignition. (Kaufmann, et al 2008) Thus, the proposed treatments seem to actually increase, not lessen, the risk of fire. The draft EA also references thinning, clearing and patch cutting within the Project area. As mentioned above, recent science shows that eliminating the canopy cover in lodgepole pine forests lessens cool and moister forest floor conditions thereby increasing the probability of fuel ignition. (Kaufmann, et al 2008)	While an increase in the probability of ignition may be possible, overall Crowning index increases reducing the risk of high intensity fire as stated as a purpose and need for the project (Draft EA pg. 9). See response to R.Bangert2 and D.Colville2.	Wildfire; Silviculture
R.Bangert4 D.Colville4	However, forests are non-equilibrium systems where change should be expected. (Kaufmann, et al 2008) Lodgepole pine line several centuries or more and during their life cycle a number of very natural, and ecologically predictable, forest-changing events or processes often occur. (Kaufmann, et al 2008)	Change should be expected in forest ecosystems and forest changing events do occur. The purpose and need for the project (Draft EA pg. 9) states, "Create conditions in treated forest stands that are less favorable for mountain pine beetle infestation for the next 20 – 30 years." Sufficient evidence	Silviculture

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	Thus, the present condition of the forest within the Project area falls squarely within the range of a healthy lodgepole forest life-cycle.	exists that forest management can reduce mortality from bark beetles and create conditions that reduce the susceptibility of stands to infestation (Fettig et. al. 2007).	
R.Bangert5 D.Colville5	Proposed treatments will cause unnatural disturbances and, in turn, increase the likelihood of invasive non-native weeds and resulting displacement of native vegetation. (Birdsall, 2012)	Design criteria specify that noxious weeds will be monitored pre- and post-treatment and weed locations will be treated (Draft EA pg. 36).	Invasive Species
R.Bangert6 D.Colville6	Although not specifically designed as such, the Project is essentially a fuel reduction project. The 2003 Healthy Forests Restoration Act (HFRA) emphasizes the need for federal agencies to work collaboratively with communities in developing fuel reduction projects. (Lake County CWPP 2006)	The project was not completed under the HFRA authority. Throughout the project the public was involved; activities included a public field trip, scoping and multiple updates at community meetings.	NEPA
R.Bangert7 D.Colville7	Although the draft EA recognizes that impacts from the proposed vegetation treatments and prescribed burns would be ground disturbance resulting in erosion and sedimentation, it does nothing to describe or adequately detail mitigation measures that will be taken to address sedimentation concerns arising from the proposed management activities such as vegetation manipulation and road construction – disturbance, transport and yields. The draft EA does not mention Longs' Gulch, even though the Project area encompasses the Longs' Gulch watershed.	Analysis for the project was completed at the 6th level watershed. Longs' Gulch is part of the Tennessee Creeks 6th level watershed. Design criteria and BMPs are in place to minimize impacts to all riparian areas, including Longs' Gulch. Design criteria specific to sedimentation are listed in the draft EA pg. 34-35. The proposed action under "Roads" (Draft EA pg. 25) states that temporary roads would be closed. Additional information was added to the Final EA to clarify those closures. The effects analysis is available in Ch. 3 of the EA and further information is location in the Hydrology/Soils Specialist Report located in the project record.	Resource Effects
R.Bangert8 D.Colville8	Failing to address the sedimentation concerns raised by the vegetation treatments contemplated by the draft EA will not improve fish habitat contrary to the goals of the PSCICC. (PSICC, USDA Forest Service 1984)	Design criteria developed as part of project and BMPs are in place to protect streams, fisheries, and other riparian habitat. Design criteria specific to sedimentation are listed in the draft EA pg. 34-35. In addition, the project adheres to the Forest Plans standards and guidelines.	Fisheries
R.Bangert9 D.Colville9	The Lake County CWPP also expressed HSTC's desire that no old or older growth lodgepole, spruce or fir be cut on public lands immediately surrounding HSTC. (Lake County CWPP, 2006) We agree with that position. This is consistent with the PSCISS, which recognizes that in forested areas more old growth structural stages are needed to improve and maintain fish and wildlife habitat.	Forest Plan Requires that 10% of diversity units be in or managed towards old growth. Fifteen percent (approximately 1,620 acres) of the lodgepole pine within the project area is in no treatment acres. In addition the thinning prescription calls for 10% of lodgepole pine acres to remain untreated	Silviculture Old Growth

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	(PSICC, USDA Forest Service 1984) However, the draft EA make only passing reference to old growth.	(approximately 700 acres) and areas with dense horizontal cover (greater than 35% dense horizontal cover) would remain as reserves. Thinning acres would be on a trajectory to meet old growth standards (Mehl, 1992). Old growth for lodgepole pine is defined (Mehl, 1992) as generally being older than 150 years. The majority of stands in the project area were regenerated during the last decades of the 19th Century and are less than 150 years old. Spruce-fir stands encompassing 1,550 acres would remain untreated unless impacted by spruce beetle. Old growth for spruce-fir is generally defined (Mehl, 1992) as stands greater than 200 years old. The majority of stands in the project area were regenerated during the last decades of the 19th Century and are less than 200 years old. Under the proposed action after completion of treatments of the maximum acres allowed, 7,540 acres (54% of forested acres) would be on a path that allows for management towards old growth meeting forest plan standards and guides.	
R.Bangert10 D.Colville10	Another concern is that the proposed vegetation management will actually increase the risk of fire. The draft EA explains that the project will create opening in the forest throughout the Project area – some up to 40 acres in size. Many of these openings will likely be taken over by invasive grasses.	Native grass and forb species will populate clearcut areas in the short term, while the areas are regenerated to lodgepole pine and other tree species. Design criteria and BMPs are in place to prevent the spread of noxious and invasive weeds. Any identified noxious weeds would be treated. See response to R.Bangert5 and D.Colville5.	Wildfire; Invasive Species
R.Bangert11 D.Colville11	The draft EA contemplates using a significant amount of prescribed fire to achieve its goals. However, prescribed fires pose a serious risk. (Task Force, 2013) It is risky because it can escape and become an even more hazardous wildfire. (Keeley, et al 2003) There is a concern that any fire on USFS land, even a prescribed fire, could burn from the USFS land into the WUI surrounding HSTC, and from there to the homes on HSTC's property including our own. (Lake County CWPP, 2006) Further, indirect effects to air	All prescribed burns conducted within the project area will follow Forest Service Manual direction and have a reviewed and signed Prescribed Fire Plan. The intent of the Prescribed Fire Plan is to minimize the likelihood of an escape fire occurring. Prescribed Fire Plans include a thorough review and plan for conducting the prescribed burn. Components of the plan include conditions for	Prescribed Fire

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	quality occur when a prescribed fire escapes and starts to burn in unmanaged stands or in untreated fuels. See Environmental Assessment 2008	conducting the prescribed burn (the prescription), resources for implementing and holding, as well as minimizing risk of escape. All Prescribed Fire Plans are required to be technically reviewed and the Agency Administrators are required to review and concur with the plan, as well as being on-site when the prescribed burns occur.	
R.Bangert12 D.Colville12	Nonetheless, in 2013 the Governor issued an Executive Order that places certain restrictions on pile burning – ranging from snow cover conditions, air pollution conditions, and proper notification of residents of the potentially affected areas and local government officials. (Task Force, 2013). The draft EA makes no mention of compliance with these restrictions.	The State of Colorado Executive Order D 2013-002. Section II Declaration and Orders. B. "*Slash pile burn operations conducted by **State Agencies** or on **State lands** shall follow the new guidelines and procedures established by the Division of Fire Prevention and Control…*" The United States Forest Service is exempt from this State Order. Prescribed burns conducted within the Tennessee Creek Project area will follow Forest Service Manual direction and will have a reviewed and signed Prescribed Fire Plan that is in compliance the Interagency Prescribed Fire Handbook. Conditions for burning (prescription), smoke management and air quality, and notifications of the public are required per the Prescribed Burn Plan. The Forest Service is also required to receive and comply with a state smoke permit. The State of Colorado Air Pollution Control Division regulates the amount of piles burned and/or acres burned per day.	Prescribed Fire
R.Bangert13 D.Colville13	Here, the draft EA is contemplating prescribed fire on over 6,040 acres in total. Minimizing the size of the prescribed burn will reduce the risk of escape. (Berreth 2010)	Though, the draft EA does specify prescribed fire may occur on 6,040 acres, those acres would not all be burned at once. Average prescribed fire units range between 150 to 400 acres. The Forest Service is also required to receive and comply with a state smoke permit. The State of Colorado Air Pollution Control Division regulates the amount of piles burned and/or acres burned per day.	Prescribed Fire
R.Bangert14 D.Colville14	The PSICC recognizes that fire suppression efforts require immediate action on escaped fires. (PSICC, USDA Forest Service	All prescribed burns conducted within the project area are required to follow Forest Service Manual	Prescribed Fire

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	1984) However, the draft EA fails to explain internal safety requirements or address the need to make sure adequate resources are in place for conducting prescribed burns. See (Task Force, 2013) Nor does it provide any requirement for extensive public notification, education or air quality monitoring, or explain what conditions on the ground are necessary to initiate a burn. See (Task Force, 2013)	direction and will have a reviewed and signed Prescribed Fire Plan. Prescribed Fire Plans include: public and personnel safety requirements, adequate resources for implementation and holding, as well as contingency resources, public notification, smoke management and air quality, conditions on the ground, as well as many other elements. In addition, the Forest Service is required to receive and comply with a state smoke permit and associated conditions. The State of Colorado Air Pollution Control Division regulates the amount of piles burned and/or acres burned per day.	
R.Bangert15 D.Colville15	Much of the prescribed burns contemplated by the draft EA are nearby the WUI. Extra precautions must be taken because of the potential of fire escape and damage the structures within the WUI. (Berreth 2010) Homes in the most hazardous locations, such as those on HSTC land including our own, could be identified and prioritized for fire protection efforts. (Syphard, et al 2012) With respect to the risk of fire escape, homes within the most hazardous locations could be identified and prioritized for fire protection efforts. (Syphard, et al 2012)	All prescribed burns conducted within the project area are required to follow Forest Service Manual direction and will have a reviewed and signed Prescribed Fire Plan. As part of the plan, critical areas (for example, homes) outside the prescribed fire boundary are identified and contingency plans put in place.	Prescribed Fire
R.Bangert16 D.Colville16	An escaped fire can have large containment costs. (Berreth 2010) While accidents may be rare, risk is never absent. (Review Team, 2012) Therefore, the USFS needs to ensure liability insurance is in pace in sufficient amount to cover potential damage to private property owners.	The need for liability insurance for USFS personnel is outside the scope of this NEPA analysis. The Responsible Official considered these comments.	Prescribed Fire
R.Bangert17 D.Colville17	In drought conditions, which much of Colorado has been experiencing, the probability of escape is greater. See (Berreth 2010) Lower probability of escape occurs in winter months when snow is still on the ground. (Berreth 2010) Thus, any prescribed fires should be limited to winter months.	All prescribed burns conducted within the project area will have a reviewed and signed Prescribed Fire Plan (see response to R.Bangert11; D.Colville11). Drought conditions are considered in the development of the Prescribed Fire Plan for the unit. Pile burning implementation is usually done in the winter months when there is snow coverage. Broadcast burning requires minimal moisture on the fuels and is implemented usually in spring and fall.	Prescribed Fire
R.Bangert18 D.Colville18	Finally, multiple burns as separate units or as phases of the same burn plan often result in increased rise of escape due to multiple	Though multiple burn units can be combined under on Prescribed Fire Burn Plan, each burn unit	Prescribed Fire

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	factors. (Team Report. 2008) Having fires in two or more locations at the same time increases the problems of communication, response time, splitting available resources, and coordination of efforts and resources between burns. (Team Report. 2008) Thus, prescribed fires occurring at any given time should be limited in number.	requires specific resources to implement the burn and to hold the burn. Each burn unit is independent from other burn units located in the same area or that may be burned in the same day. See response to R.Bangert11, D.Colville11 regarding prescribed fire planning.	
R.Bangert19 D.Colville19	The draft EA is devoid of discussion regarding preparation of prescribed fire areas. There is no reference to cutting down ladder fuels, making piles of dead brush, etc. It should be modified to include how the fire crews will prepare the proposed fire sites.	All prescribed burns conducted within the project area will have a reviewed and signed Prescribed Fire Plan. Within this plan, individual units are identified and the specific pre burn preparation is addressed. Pre burn preparation may include: limbing trees, construction of fireline, etc.	Prescribed Fire
R.Bangert20 D.Colville20	The draft EA should anticipate, monitor, and provide for perpetual treatment of weed infestations anywhere within the Project area using hand tools and hand-held power tools. Assess the status of weed invasions in previously treated areas within the proposed Project. Treat weed invasions in these areas prior to conducting additional vegetation management activities.	The design criteria listed in the draft EA pg. 36 addresses pre- and post-monitor and treatment of invasive species throughout the project area. As stated in the Invasive Species Action Plan (USDA 2008), the treatment of invasive species utilizes multiple methods of treatments including manual treatment (pulling of weeds) and herbicide treatments. The Tennessee Creek Project EA tiers to the Invasive Species Environmental Assessment (1998), 2013 Management of Noxious Weeds Biological Assessment, and PSICC Invasive Species Strategic Plan (2008 – 2010) (Draft EA pg. 36)	Invasive Weeds
R.Bangert21 D.Colville21	In light of the scientific evidence that grasslands are often more fire prone, the draft EA should re-examine management practices of converting woodlands to grasslands. (Syphard, et al 2012)	Conversion of woodlands to grasslands is not proposed under this action. All forested areas that receive regeneration treatments (clearcuts, patch cuts) will be regenerated to forested areas. For a few years there will be an increase in grasses, but this is temporary. The area will start to regenerate to a forest within 5 years. The cited reference is based on Southern California fuel types.	Silviculture
R.Bangert22 D.Colville22	The draft EA only makes passing reference to the Interagency Prescribed Fire Guide. There is no substantive discussion re contracting, permitting, writing, review and approval, implementation or reporting related to the plan. It is critical that USFS do more than just follow guidelines to frame prescribed fire	Forest Service Manuel direction requires the preparation of a site-specific Prescribed Fire Plan for each prescribed burn in advance of the ignition. The Interagency Prescribed Fire Planning and Implementation Procedures Guide provide	Prescribed Fire

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	planning, implementation, and monitoring especially since the Interagency Prescribed Fire Guide provides only what is minimally acceptable for prescribed fire planning and implementation. (Review Team, 2012)	standardized interagency guidance, specifically associated with the planning and implementation of prescribed fire on federal lands. It describes the minimum interagency requirements that are acceptable for all phases of a prescribed fire for federal National Wildfire Coordinating Group (NWCG) member agencies, which includes the Forest Service. All prescribed burns conducted within the Tennessee Creek project area will have a reviewed and signed Prescribed Fire Plan. The State of Colorado Air Pollution Control Division is responsible for issuing the smoke permit.	
R.Bangert23 D.Colville23	Do not treat riparian areas along Long's Gulch to protect water quality and geomorphology, or alternately, that HSTC be consulted about treatments, equipment, means and methods utilized in the Long's Gulch area.	Design criteria and BMPs are in place to protect riparian areas; specific design criteria to protecting soil, water, riparian and aquatic resources are listed on pages 34-35 of the draft EA.	Riparian
R.Bangert24 D.Colville24	Environmental review documents should address the scientific literature showing that wildfires may burn hotter, kill more trees, and be a greater threat to lives and property in areas where tree density and canopy has been overly thinned.	The best available science was used to develop the purpose and need, proposed action, and to perform the effects analysis in the EA. A literature cited section is available in the EA. The analysis included a review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information. Several BMPs and design criteria were developed with the consideration of best available science to address the effects of the treatments. The design criteria are available in Ch. 2 of the EA.	Best Available Science
R.Bangert25 D.Colville25	More and detailed analysis of specific prescribed burn will allow the USFS to change acre size, actual prescription goals, or the prescription itself.	See response to R.Bangert11, D.Colville11; R.Bangert13, D.Colville13; R.Bangert14, D.Colville14; and R.Bangert17, D.Colville17.	Prescribed Fire
J.Brink1	Activity in the area will greatly increase with logging and probably fire wood cutting also. What is left when the project is done will create more of a fire hazard than there is now.	Activity fuels created by vegetation treatment will reduced by piling and burning or broadcast burning as part of the proposed action. While human activity may cause an increase in fire ignitions, regulations, contract provisions and special orders are available to the Forest Service to lessen the risk of human caused fires resulting from management action.	Wildfire

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
J.Brink2	There will be more erosion and sediment with the run off.	Design criteria and BMPs are in place to reduce erosion and sedimentation associated with project activities.	Hydrology/Soils
G.Conway1	This endorsement comes from both the Metro District Board of Directors as well as the Sylvan Lakes Property Owners Association. Our belief is that the project will significantly mitigate the risk associated with a wildfire in the Northern Lake County area. Because this project surrounds the Sylvan Lakes community on three sides and because we are in a high risk wildfire zone, as determined by the Colorado State Forest Service, the TCP is not only relevant but warmly welcomed.	Supportive comment.	Alternative 1
S.Johnson1	The Forest Service is in violation of the National Environmental Policy Act (NEPA) by implementing their in-house lynx habitat mapping for the Tennessee Creek Project.	The lynx re-mapping effort is outside the scope of this project. The national Lynx Steering Committee has been the expert body providing mapping and re-mapping guidance consistent with the LCAS and primarily directed that lynx habitat mapping be done in coordination with the FWS. The map is an internal resource inventory and the information provided by the map is used later in decisions that go through their own separate NEPA process at that time. All criteria and procedures for lynx habitat mapping set forth in the SRLA were followed in the updating process.	NEPA; Lynx Habitat Mapping
S.Johnson2	There are at least two significant flaws to the habitat mapping for the affected LAUs in this project that the public should be able to address. The first is that the extremely large size of identified LAUs. The second obvious problem with the Forest Service's delineation of LAUs is the mapping of lynx habitat within the LAUs.	The lynx re-mapping effort is outside the scope of this project. Per the SRLA Implementation Guide: Habitat Mapping, the LAUs are intended to approximate the home range size of a female lynx that includes at least 10 square miles of primary habitat vegetation and contain year round habitat components. All guidance provided by the LCAS and SRLA was followed in the mapping process of lynx habitat. The re-mapping process is done in conjunction with approval from USFWS.	Lynx Habitat Mapping
S.Johnson3	The BA at 34 claims that mature monocultures of lodgepole pine are not considered lynx habitat. This would require that these	As stated in the Southern Rockies Lynx Amendment Implementation guide, Chapter 8, pg. 2, criteria 3c, "*Lynx do not appear to be associated with dry forest*	Lynx

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	stands do not have any red squirrels or hares. Research in Colorado has not demonstrated that hares and red squirrels are absent from lodgepole pine forests. The only forest hares are reported to be absent from is ponderosa pine. There have been at least 3 lynx radio-collared in this landscape. Their habitat use data should be used for mapping lynx habitat, so that agency contentions regarding nonlynx habitat can be assessed by the public.	*habitat types (e.g. ponderosa pine, dry Douglas-fir, and dry or climax lodgepole pine) except to move among mesic stands (Ruggiero et al. 200b). These dry types should not be included as vegetation contributing to lynx habitat."* The three lynx were collared in the winter of 2012-2013 during a Rocky Mountain Research Station study. The data and findings from the study are not available.	
S.Johnson4	The Forest Service is violating the Endangered Species Act (ESA) by implementing the current project because the Biological Opinion (BiOp) for the Southern Rockies Lynx Management Direction (SRLMD) is invalid, and needs to be revised/redone, because it does not address fragmentation impacts on lynx.	The comment has been noted. This is beyond the scope of this project and refers to a U.S. Fish and Wildlife Service report, not Forest Service.	SRLA
S.Johnson5	The BiOp for the SRLMD is also invalid (as ESA violation), and incidental take has been underestimated, because the fragmentation impacts of forest thinning on lynx winter movements was never evaluated.	See response to S.Johnson4.	SRLA
S.Johnson6	The BiOp for the SRLMD is also invalid (an ESA violation) because it does not require a minimum level of lynx winter habitat, the most key habitat for lynx persistence.	See response to S.Johnson4.	SRLA
S.Johnson7	The BiOp for the SRLMD is invalid because it does not require management of squirrel habitat, even though research in Colorado indicates that red squirrels are an important prey species for lynx.	See response to S.Johnson4.	SRLA
S.Johnson8	The BiOp for the SRLMD is also invalid because new science has emphasized the importance of addressing snowmobile impacts on lynx at each geographic area, as impacts will be variable.	See response to S.Johnson4.	SRLA
S.Johnson9	A BiOp is required for the current project to address the increased incidental take that will occur as allowed by the existing BiOp for the SRLMD; tiering to the existing BiOp is invalid due to the underestimate of take as per that BiOp.	See response to S.Johnson4.	SRLA
S.Johnson10	The Forest Service is violating the National Forest Management Act (NFMA) because they have failed to complete a Forest Plan amendment in order to implement new criteria for multi-stored lynx habitat.	The Southern Rockies Lynx Amendment is a Forest Plan amendment and addresses criteria for multi-storied lynx habitat in Standard VEG S6 (Ch. 3 of the SRLA Implementation Guide, pg. 4) which was incorporated into this project.	NEPA/NFMA
S.Johnson11	The Forest Service is violating the NEPA by failing to provide a reasonable description of the proposed project, including effects on	A thorough explanation of the proposed action as well as effects on lynx can be found in the BA, pages	NEPA; Lynx

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	the threatened lynx.	7-16 and 23-45 respectively (located in the project record). The proposed action description can also be found in Chapter 2 of the EA and the effects analysis in Chapter 3.	
S.Johnson12	The Forest Service will violate the NEPA for this project by failing to evaluate the impacts of the project on a key lynx prey species, the red squirrel.	This comment has been noted. An addendum was written in March 2014 to the Wildlife BA (located in the project record) to clarify the information regarding potential impacts to red squirrel using the best available science. This information was added to the Final EA, Ch. 3 Wildlife section.	NEPA; Lynx
S.Johnson13	The Forest Service will violate the NEPA and the ESA by failing to evaluate the impact of current and increased snowmobile use on lynx habitat quality that will result from the project, and to use the current best science for this analysis.	This comment has been noted. Impacts from current snowmobile use are addressed in effects analysis section 9.1 of the BA (specifically pgs. 24-25) located in the project record. An addendum was written in March 2014 to the Wildlife BA (located in the project record) to clarify the information regarding potential increased snowmobile use on roads using the best available science. This information was added to the Final EA, Ch. 3 Wildlife section.	NEPA; Lynx
S.Johnson14	The agency is violating the NEPA in regards to their draft analysis of project impacts on lynx by failing to evaluate, disclose and quantify current and planned open road densities in the project area, both for summer and winter.	Open road density will not change as a result of this project. All new roads are temporary in nature and will be closed and rehabilitated following treatment (Draft EA pg. 24 and 25). Per the ROD in the SRLA, "*Unlike high-speed highways, the types of roads managed by the Forest Service do not have the high speeds and high use levels that would create barriers to lynx movements or result in significant mortality risk*." An addendum was written in March 2014 to the Wildlife BA (located in the project record) to further clarify impacts from temporary roads. This information was added to the Final EA, Ch. 3 Wildlife Section.	NEPA; Lynx
S.Johnson15	The agency is violating the NEPA by failing to evaluate the fragmentation impacts of the project on lynx.	This comment has been noted. An addendum was written in March 2014 to the Wildlife BA (located in the project record) to clarify impacts from fragmentation. This information was added to the Final EA, Ch. 3 Wildlife section.	NEPA; Lynx
S.Johnson16	The agency is violating the NEPA by failing to provide a clear analysis of project impacts on lynx to the public for each	Chapter 3 of the Draft EA contains the analysis of project impacts (specifically pgs. 75-76 for No Action	NEPA; Lynx

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	alternative, including the no action, based on the two time-frames identified in the BA (short term is 0-15 years, long term is greater than 15 years). The agency claims that the Project is designed to improve lynx foraging habitat where horizontal cover is lacking. However, the agency notes that improvement of hare habitat will not occur for 15-40 years. During the interim (as well as longer), adverse impacts will occur to lynx due to a loss of red squirrel and travel habitat. Red squirrel habitat will not return for over 100 years in clearcuts. So there will be adverse impacts to lynx in both the short and long term.	analysis; pgs. 76-83 for Proposed Action analysis; and pgs. 83-84 for Alternative 2 analysis; as well as pgs. 84-86 for cumulative effects analysis for both action alternatives). See response to S.Johnson12 associated with red squirrel habitat.	
S.Johnson17	The agency is violating the NEPA by failing to provide a clear analysis of winter lynx habitat by alternatives, including the no action. The analysis implies that winter hare habitat is the same as winter lynx habitat. This is not the case in Montana, and it may not be the case in Colorado as well.	Chapter 3 of the EA or section 9.0 of the BA (located in the project record) contains a detailed analysis by alternative.	NEPA; Lynx
S.Johnson18	The agency is violating the NEPA by failing to clearly define the project. The BA claims that salvage logging of over 1000 acres of lynx/hare winter habitat will occur if insect infestations become severe. The EA needs to include in the proposed action only those actions that will be done. Additional treatments would be included under cumulative effects, and require a new NEPA analysis. The agency claims that the Project protects high quality lynx habitat stands. Yet over 1000 acres of high quality lynx habitat in spruce/fir stands will be salvage logged and degraded, not protected, for lynx.	Chapter 2, pg. 23 of the Draft EA includes a description of the possible treatments that would occur in spruce. Chapter 3 includes the analysis of that treatment. Treatments would only occur in spruce-fir stands if spruce beetle infestations occur. Spruce-fir stands with a dead overstory and lacking multistory structure are considered unsuitable (SRLA).	NEPA; Lynx
S.Johnson19	The agency will violate the NFMA by failing to meet the Forest Plan standard to maintain lynx connectivity in linkage areas. Forest clearcutting and thinning will reduce lynx movement permeability of this landscape. In addition, many, most, or almost all protected reserves of high horizontal cover will not be available to lynx due to habitat fragmentation with clearcuts and thinned forests; lynx access will be impaired and/or prevented. If lynx can't use reserves, they will not benefit lynx. The agency claims that the Project does not prohibit movement throughout the LAUs or linkage areas. There is no analysis provided as to what level of habitat connectivity is required before lynx	This comment has been noted. An addendum was written in March 2014 to the Wildlife BA (located in the project record) to clarify the information regarding connectivity. This information was added to the Final EA, Ch. 3 Wildlife section.	NFMA; Lynx

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	travel is prohibited. In addition, the agency does not define when a reduction of current habitat connectivity becomes significant, measurable impact. The agency claims that the Project is consistent with the SRLA conservation measures. As we noted in our comments, the SRLA does not ensure viability of lynx due to numerous flaws. And the agency failed to demonstrate that lynx travel through the landscape will not be measurably affected.		
S.Johnson20	The agency claims that the Project promotes biological diversity by mimicking natural disturbance patterns. Logging does not mimick natural processes because the trees are removed rather than remain on site (from fires, insects and disease, blowdown) to provide snags and downed logs for hare, squirrel and lynx habitat.	Design criteria specify snags and coarse woody debris requirements for the project. The requirements exceed Forest Plan standards.	Wildlife
S.Johnson21	Multiple questions were posed regarding the Tennessee Creek project. See the comment document for the complete list.	The intent of the 30 day notice is to address issues from the public, specifically issues that have a cause and effect relationship. Questions that had a specific cause and effect relationship were addressed separately.	NEPA
T.Martinez1	In general, we support this type of management activity as any forest management activities that help maintain the health of the forest systems in and around the CDT also ensure this defined Trail Experience is encountered.	Supportive Comment	Alternative 1
T.Martinez2	However, with respect to vegetation management in or adjacent to the CDT Corridor, we encourage decisions to utilize the following principles: 1. Vegetation Management Treatments like clear cutting and thinning be used as a tool only when necessary to meet approved objectives identified in the management plan for the area or for human safety. 2. Vegetation Management Activities should serve to minimize long-term negative impacts to the aesthetic qualities of the Trail, and its surrounding environment. 3. Employ the minimal tools necessary to meet the above objectives.	Two of the main components of the purpose and need of the project are to create conditions that are more resilient to insect, disease and fire and to provide for sustainable watershed conditions. Both components improve human safety. Design criteria have been added to the Final EA to address aesthetic qualities and placement of treatment units adjacent to the CDNST.	CDNST
T.Martinez3	In the event of unavoidable impacts to the Trail or Trail Experience, actions are taken to mitigate these impacts and to continue to meet the scenic objectives defined by the 2009 CDT Comprehensive Plan for activities occurring in or adjacent to the CDT Corridor so as to not negatively impact the CDT experience.	The project adheres to the Forest Plan for the San Isabel National Forest. The CDNST is not within or adjacent to the project area on the White River National Forest. Design criteria have been added to the Final EA to address aesthetic qualities and placement of treatment units adjacent to the CDNST.	CDNST

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
T.Martinez4	While the Environmental Assessment follows existing Forest Plan Direction, it does so with out addressing FSM 2353.44 direction for establishing a CDNST Management Area, and therefore in the descriptions of management areas included with in this project, the CDT Management Area is not included. We suggest this be addressed through a Forest Plan Amendment to incorporate this new direction.	PSICC Forest Plan does not have a specific Management Area for the CDNST. However there is Forest Plan Direction for the CDSNT which states for the CDNST: "*All other prescribed direction, standards and guidelines, for the specific management area through which the CDNST passes apply.*" The CDNST falls within Management Area 2B-Roaded Natural.	CDNST
T.Martinez5	We suggest that for the CDT, immediate foreground, as described in item 44, is not an appropriate description for the zone of influence around the CDT, but rather the CDT Foreground is consistently between 0 and ½ mile of the centerline of the CDT Travelway/centerline.	Design criteria #44 has been modified in the Final EA and applies to all trails in the project area; it states, "*No slash would be piled within 50 feet from trails and roadways to minimize visual impacts along these routes*." Immediate foreground 0-50 has been removed.	CDNST
T.Martinez6	There is no description as to whether or not the project will modify inventories ROS settings through road building (even temporary ones) with in the CDT Corridor.	The CDNST falls within Management Area 2B-Roaded Natural. Temporary roads do not alter the ROS in a Roaded Natural setting.	CDNST
T. Martinez7	As a Congressionally Designated Resource, and to address our above comment, we suggest inclusion of a separate section(s) that described the effects on the nature and purposes of the CDT, which should include a description of impacts and mitigation of those impacts to the CDT Experience as defined by the CDT Study Report, and a determination that the project doesn't substantially interfere with the nature and purpose of the CDT.	The comment has been noted. An addendum has been completed that address the CDNST and the information has been added to the Final EA. The project is in compliance with the PSICC Forest Plan.	CDNST
T.Martinez8	Mapping of the CDT Corridor within the Project area. In order to fully evaluate the impacts to the CDT in the area, map elements included in the EA and all documents should appropriately reflect, define and describe the CDT Corridor as directed by the 2009 CDT Comprehensive Plan.	The CDNST is shown on the project maps (Draft EA, pg. 17). Defining and describing the corridor would be accomplished when creating a Unit Plan and is outside the scope of this project.	CDNST
T.Martinez9	When at all possible, versus building temporary roads, or re-opening closed ones, CDTC encourages the use of existing travel corridors for removal of trees, and that all activities be conducted with a sensitivity to the resulting visual impacts as seen from the CDT, even outside of the project area.	Existing travel corridors will be used when possible. Design criteria have been established in the project for Visual Resources for the CDSNT and a VQO of Partial Retention.	CDNST Visual Impacts
J.Mellgren1	While these seem like admirable justifications for the Tennessee Creek Project, the proposed action, accompanying EA, and the Biological Assessment (BA) do not support any of these purposes and needs.	The comment has been noted. Pg. 9-10 of the Draft EA describes the purpose and need as well as how the proposed action ties in. Complete analysis is located in Ch. 3 of the EA and specialist reports located in the project record.	Purpose & Need

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
J.Mellgren2	The EA puts forth three alternatives for the Tennessee Creek project: a no action alternative; Alternative 1 (the proposed action), which contemplates 9,480 acres of clearcuts and forest thinning; and Alternative 2, which contemplates 6,820 acres of clearcuts and forest thinning. This, however, does not represent a reasonable range of alternatives.	Per Forest Service Handbook 1909.15, Ch. 10, Section 14, "No specific number of alternatives is required or prescribed," and "Reasonable alternatives to the proposed action should fulfill the purpose and need and address unresolved conflicts related to the proposed action. Be alert for alternatives suggested by participants in scoping and public involvement activities." Issues / unresolved conflicts from **scoping and public participation** were included in the development of alternatives and design criteria.	Alternatives
J.Mellgren3	Because the lynx is listed as threatened under the federal Endangered Species Act, and is an endangered species under Colorado State law, the EA must (but does not) adequately consider the effects of the project on the lynx by using the best available science.	The best available science was used to perform the effects analysis in the EA, BA, and BE. A literature cited section is available in the EA. The analysis included a review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information. Several BMPs and design criteria were developed with the consideration of best available science.	Lynx
J.Mellgren4	In analyzing the impacts of this project, the Forest Service appears to cite the LCAS from 2000. However the newest version, published in August 2013 represents the breadth of research that has been published since 2000 and should guide Forest Service decisionmaking.	The SRLA is the document Region 2 Forest Service is required to follow. Much of the new research used in the revised LCAS, was also used to shape and guide the SRLA in 2008. Also, though the date on the cover of the revised LCAS is August 2013, this document was not available to the public and agencies until December 2013, after the analysis for this project were completed.	Lynx
J.Mellgren5	It is widely known and accepted that recent research by world-renowned lynx researcher John Squires, represents the best available science on lynx. For this reason, is it puzzling why only one paper written by Squires is listed in either the EA or the Biological Assessment (BA), and that paper actually relates to wolverine. The EA is surprisingly devoid of a thorough review of lynx science and the anticipated effects of the Tennessee Creek project on lynx.	Though John Squires is not listed as the primary author on some references, his expertise was still used. For example, "Ruggiero, Leonard F., et al. *Ecology and Conservation of Lynx in the United States.* University Press of Colorado, Boulder, CO, 2000." is also authored by Squires but is captured in the "et al". His research was also used extensively in shaping the Forest Service's guiding lynx documents (LCAS and SRLA).	Lynx
J.Mellgren6	The EA has not taken the required hard look on the direct, indirect, and cumulative effects of the project on lynx as required by NEPA.	The best available science was used for the full analysis of effects on wildlife and can be found in	Lynx

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
		Chapter 3 of the EA. A more detailed effects analysis can be found in the BA and BE (located in the project record). A reference section of literature used is found at the back of each document.	
J.Mellgren7	At a minimum, the BA should be an attachment to the EA and available for public review on the Forest Service's website. This sort of transparency in decision-making is fundamental to complying with NEPA.	The BA is available as part of the project record.	Biological Assessment
J.Mellgren8	The process for creating the lynx habitat, and a copy of the map itself, should be included in the EA so that the public has an opportunity to comment on the methodology and assumptions used by the Forest Service.	See response to S.Johnson1.	Lynx Re-mapping
J.Mellgren9	Lynx avoid areas that have been clearcut, logged, and even thinned. The Interagency Lynx Conservation Assessment and Strategy (August 2013)(LCAS) includes vegetation management as one of the top four anthropogenic threats to lynx. See LCAS at 69.	Please refer to the same document for *Conservation measures for vegetation management* (pgs. 90-91) which mirror those set forth in the Forest Service's guiding document for lynx, the SRLA. This project is compliant with these measures through project design and design criteria.	Lynx
J.Mellgren10	The EA explicitly discusses the benefits of the Tennessee Creek project in terms of the benefits of the project on snowshoe hare. However, lynx winter habitat may actually be more important than producing habitat for snowshoe hare. The Forest Service must not confuse these two things and must analyze and disclose the effects of the Tennessee Creek project on lynx winter habitat, as well as any effects on snowshoe hare, recognizing that they are not the same thing.	Lynx winter habitat is not exactly the same as snowshoe hare winter habitat though the two are very closely associated. Standards and guidelines set forth in the SRLA (2008) to conserve lynx and lynx habitat as well as *Conservation measures for vegetation management* provided in the updated LCAS (2013) explicitly focuses on retention and creation of snowshoe hare winter foraging habitat. Effects analysis for lynx and their habitat is found in Chapter 3 of the EA and a more detailed analysis can be found in the BA (located in the project record).	Lynx
J.Mellgren11	The Tennessee Creek project does not conserve lynx winter habitat, nor does it manage stands in a manner that would allow younger stands to eventually become good lynx winter habitat.	As stated in the draft EA under the Proposed Action for Alternative 1, (pg. 14), criteria #4: "*In mapped lynx habitat, stands with greater than 35 percent dense horizontal cover would also be retained*." According to the SRLA Implementation Guide: Chapter 3, pg.10, "*Squires suggested that during the winter, lynx avoided areas with horizontal cover below 35%. This 35% horizontal cover level represents the lower "hinge point" for lynx use during the winter*." Not treating in stands with >35%	Lynx

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		DHC or spruce-fir stands (also stated in the proposed action) will conserve lynx winter habitat. There are 345 acres of young stands within the project area and only 65 acres of those are within lynx habitat. See pg. 37-38 of the BA (located in the project record). The treatments proposed for these acres are consistent with Exception 5 of Standard VEG S5 of the SRLA.	
J.Mellgren12	Additionally, as noted by the EA, the project area, lynx denning habitat would be severely degraded and it "would likely take 150+ years to recover." EA at 79. This is not an insignificant amount of time. The Forest Service must include more analysis than just a conclusory statement saying that lynx denning habitat would be severely degraded.	As stated in the EA, stands with >35% DHC will not be treated (where denning would likely take place) and areas targeted for treatment likely do not provide denning habitat characteristics currently (climax lodgepole pine without much downed woody debris). "*Mature spruce/fir stands are typical of providing higher quality denning habitat than lodgepole stands and would not be harvested under this proposed action (other than a possible salvage harvest and then 10% of the dead trees would remain for quality lynx denning habitat).*" Pg. 37 of the BA. However, that is not to say that denning couldn't be found in lodgepole stands with <35% DHC. In those areas, denning habitat could be degraded. According to the SRLA, "… *it appears that denning habitat may not be a limiting factor for lynx in the SRMGA (Southern Rocky Mountains Geographic Area), as most LAUs have between 20-40 percent denning habitat*". Pg 86 of the SRLA.	Lynx
J.Mellgren13	The BA states that "[e]ven though a design criteria (criteria 3) requires appropriate amounts of down logs or piles to remain on the landscape, it would not likely be enough to be considered quality denning habitat." BA at 37. Why wasn't the project designed so that enough downed woody debris of appropriate composition was left of the landscape after treatment?	See pg. 37 of the BA. Green spruce-fir stands are not going to be treated nor are stands with >35% DHC (areas where denning would likely take place.) Most denning likely takes place in wilderness and roadless areas and stands not targeted for treatment. The intent of this design criteria is not to provide for lynx denning habitat, but to provide habitat for small mammals and birds.	Lynx

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
J.Mellgren14	Because lynx denning must occur near lynx foraging habitat (see LCAS at 29), the Forest Service must disclose and analyze how much denning habitat would be removed by the project, how much denning habitat will remain under the selected alternative, and whether the remaining denning habitat is near suitable lynx foraging habitat.	The SRLA contains specific re-mapping guidelines. Year round habitat requirements are included in delineating lynx habitat and LAUs. Though denning is not specifically mapped out (and therefore cannot be quantified by acres), it is undoubtedly captured under primary habitat delineation of spruce-fir. Green spruce-fir stands will not be treated in this project nor will stands with >35% DHC, both characteristics of suitable denning habitat. The national Lynx Steering Committee has been the expert body providing mapping and re-mapping guidance consistent with the LCAS. Again, per the proposed action, stands targeted for treatments are climax and seral lodgepole stands which may or may not be next to spruce-fir stands. Treatments in these areas are will likely increase lynx foraging habitat.	Lynx
J.Mellgren15	The Forest Service must take a hard look at the effect of the project on lynx denning habitat, and as the draft EA is written, it has failed to do so. This also counsels the preparation of an EIS.	See response to J.Mellgren14.	Lynx
J.Mellgren16	The Forest Service has failed to take a hard look at effects to the linkage area or ensure compliance with the standard to maintain habitat connectivity for lynx in the Southern Rockies Lynx Management Direction.	See response to S.Johnson19.	Lynx
J.Mellgren17	The EA does not adequately discuss the effects of the construction of temporary roads and the recommissioning of previously closed roads on lynx and fragmentation of lynx habitat, as well as snow compaction and the potential for recreational use of those roads. Additionally, the EA notes that roads will be open when "units are open for public fuelwood," (EA at 24), however no analysis can be found about what effects the opening of these roads to the public during those times may have on lynx and lynx habitat.	See response to S.Johnson13 and S.Johnson14.	Lynx
J.Mellgren18	The EA also does not state how roads will be decommissioned after the project is complete. In fact, the EA hints that the Forest Service does not have a plan for how roads will be decommissioned and what steps will be taken to return areas that became unsuitable lynx habitat due to the construction of temporary roads back to suitable lynx habitat.	Draft EA, pg. 25 states that temporary roads would be closed after treatments are complete. Additional information was added to the Final EA to clarify the how the temporary roads would be closed and rehabilitated.	Temporary Roads
J.Mellgren19	A map of where these temporary roads will be located should also	See response to S.Johnson14 and S.Johnson19.	Lynx

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	be included in the EA, and the BA, to ensure that the effects of the temporary roads on lynx connectivity and lynx linkage areas are indeed insignificant, as claimed by the Forest Service.		
J.Mellgren20	The Forest Service must disclose specific plans for what activities would take place in winter months, what effect those activities would have on lynx and lynx habitat in winter months, and whether any mitigation measures will be implemented to ensure that disturbance to lynx and lynx habitat will be minimized in winter months.	Pg. 82 of the draft EA under "Disturbance/Displacement" discusses winter hauling and pile burning. There are no mitigation measures or design criteria specifically for lynx during the winter months though some other design criteria (Chapter 2, criteria #5, Draft EA) would offer protection from select areas during the winter months in lynx habitat. Recreational design criteria will highly limit the feasibility of winter operations.	Lynx
J.Mellgren21	The EA states that all acres are presumed to be lynx habitat for the purposes of analysis, however the BA then states that no more than 1% of the lynx habitat of any LAU will be thinned because "many stands proposed for precommercial thinning in the Massive LAU are not within lynx habitat and would not contribute to the 1% threshold." BA at 42. If all acres proposed for treatment are considered to be lynx habitat, how can some stands proposed for thinning not be in lynx habitat? This inconsistency must be addressed.	Pg. 37 of the BA (located in the project record) describes in detail the difference between thinning and pre-commercial thinning stands: "*These (*pre-commercial thinning*) stands are different from the rest of the proposal because they have been pre-identified on the landscape. From looking at the lynx habitat map (U.S. Forest Service 2013) in conjunction with the location of these old clear cuts, it can determined how many acres are in lynx habitat and how many are located in climax lodgepole stands (*not lynx habitat*).*"	Lynx
J.Mellgren22	The EA for the project also fails to take a hard look at the indirect and cumulative impacts to lynx.	See response to J.Mellgren6.	Lynx
J.Mellgren23	In addition to failing to take a hard look at the direct, indirect, and cumulative impacts to lynx, the EA for the project also fails to take a hard look at the direct, indirect, and cumulative impacts to other native species, including but not limited to wolverine, elk, and deer, native vegetation, and soil quality and productivity.	See response to J.Mellgren6.	Wildlife
J.Mellgren24	Although the EA discusses the effects of climate change on the project area, the EA is silent as to the direct, indirect, and cumulative effects of the project on climate change.	The specialist report for climate change has been added and information included in the Final EA.	Climate Change
J.Mellgren25	The EA does not contain any accounting of what magnitude of carbon release would occur by implementing the project, nor is there any carbon release analysis in the cumulative effects section. NEPA requires that this information be disclosed.	Information on carbon release was included with the Climate Change specialist report and included in the Final EA.	Carbon
J.Mellgren26	As discussed throughout these comments, the Tennessee Creek	Significance varies with the setting of the proposed	NEPA

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	project implicates a majority of the significance factors, and therefore the Forest Service must prepare an EIS to analyze this major federal action that may significantly affect the quality of the environment. Further, as pointed out elsewhere, the project will result in a number of significant adverse impacts, including on lynx, wolverine, elk, wilderness characteristics, quiet recreation, and climate change.	action. In the case of site-specific action, significance usually depends upon the effects in the locale rather than in the world as a whole. Intensity refers to the severity or degree of impact (40 CFR 1508.27) The proposed project would treat approximately 5% of the Leadville Ranger District (1.34% of the San Isabel National Forest) and less that 0.1% of the Holy Cross Ranger District. The Draft EA is site specific and its actions incorporate those practices that are consistent with the forest plans for the San Isabel and White River National Forests. The Draft EA, Ch. 3 contains the effects analysis for wildlife, recreation, cultural resources, botany, as well as others. The climate change analysis has been added to the Final EA. Design criteria and BMPs are in place to reduce impacts to wildlife, recreation, riparian, as well as other resources.	
J.Mellgren27	The project will be detrimental to those who use the project area for quiet recreation due to mechanical logging and the construction of roads.	Impacts from mechanical logging and smoke from prescribed burns would be temporary in nature and impact only localized areas for a short duration of time.	Recreation
J.Mellgren28	As discussed elsewhere, the effects of the project are highly uncertain and involve unknown risks. For example, the Forest Service's Rocky Mountain Research Station has published research stating that forest management does little to nothing to stop the spread of mountain pine beetles. This runs contrary to the assertions made by the Forest Service in the EA, and demonstrates that the possible effects of the project are indeed uncertain.	See response to R.Bangert1, D.Colville1.	
J.Mellgren29	If the proposed action is approved, it may establish a precedent for future actions with significant effects and would impact planning for future projects both within the Leadville Ranger District, and across the national forests in the project area.	The project would treat 5.4% of the Leadville Ranger District and 1.34% of the San Isabel National Forest. The environmental assessment is site specific and its action incorporate those practices envisioned in the San Isabel and White River forest plans and are within the forest plan standards and guidelines. Design criteria and BMPs are place to limit resource damage.	NEPA
J.Mellgren30	The proposed action is related to other actions with cumulatively	Cumulative effects are have spatial and temporal	NEPA

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	significant impacts. This includes logging projects not only near Leadville, but across Colorado, and even across the entire United States.	boundaries. Cumulative effects have been address for the each resource in the Draft EA, Ch 3.	
J.Mellgren31	The Tennessee Creek project also threatens a violation of both Federal and State law. Because both the lynx and wolverine are listed as endangered under the State of Colorado's list of Endangered and Threatened Species, and because take of listed species is a violation of Colorado law (CO ST § 33-2-105(4)), implementation of the project could lead to a violation of state law. Further, as discussed elsewhere in these comments, the project would violate the San Isabel Forest Plan and therefore would violate the National Forest Management Act.	No take or adverse effects to either of these species is anticipated. The Forest Service is awaiting concurrence for this project from FWS as lynx are federally listed as threatened and wolverine are a federal candidate species. This project adheres to the PSICC and White River Forest Plans.	Endangered Species Act
J.Mellgren32	The project, as proposed, fails to ensure compliance with the Lynx Amendment in a number of important respects. For example, the Lynx Amendment states that habitat connectivity must be maintained for lynx within and in between LAUs. The project, as proposed, fails to ensure compliance with this standard.	See response to S.Johnson19.	Lynx
J.Mellgren33	On a related note, how is the Forest Service ensuring compliance with VEG S6? Evidence in the EA reveals that mature multi-stored forest stands that provide good hare habitat will be logged.	The project is based on "un-even aged management" strategies. This project is compliant with VEG S6 Exception 4.	SRLA
J.Miller1	Clear-cutting is a poor idea esthetically, ecologically, and, in a tourism-heavy economy, financially.	The project would adhere to the Forest Plan standards and guidelines. Clearcutting is the most effective route to rapid and successful regeneration in lodgepole pine forests (Koch 1996 Pg. 160).	Silviculture
J.Petrenas1	I ask for added diligence when using fire treatments as well as in mitigating the anticipated sedimentation.	Please see response to R.Bangert11, D.Colville11 regarding prescribed fire. Design criteria developed as part of project and BMPs are in place to protect streams, fisheries, and other riparian habitat. Design criteria specific to sedimentation are listed in the draft EA pg. 34-35. In addition, the project adheres to the Forest Plans standards and guidelines.	Fire Hydrology/Soils
R.Smith1	Can the project be implemented as proposed? We know of no mill in the area that could handle this much wood, even if it was broken up into several sales. Also, much of the lodgepole pine is relatively small diameter, limiting its commercial	Recent history and nearby projects suggest the project can be implemented as planned. Recently the White River National Forest awarded (2013) a Ten Year Stewardship Contract that treats 2,000 acres/year in a similar forest type. The Pike-San	Economics

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	utility. In light of the above, a smaller project would be more appropriate, and more likely to actually be implemented.	Isabel and Arapahoe-Roosevelt National Forests have awarded (2009) and implemented a 10 year stewardship program that is in Year 5. There is currently no backlog of unsold timber sales on the Pike-San Isabel NF that produces and average of 15,000 CCF/year. Timber from the Pike-San Isabel National Forests has been bid on and hauled to mills in Saguache, Montrose, Canon City, Pueblo as well as numerous other smaller sawmills in Colorado.	
R.Smith2	We are concerned that too much of lynx habitat would be cut. Lynx are known to avoid large openings. They need overhead canopy cover to hide from predators. Clearcuts would convert lynx habitat to unsuitable. EA at 79. While the clearcut areas would regenerate to lodgepole pine, which could become snowshoe hare (lynx' favorite prey) habitat in 20-30 years, much of this habitat would not be useful to lynx because it would be in large areas with no overhead cover. Maintaining cover is especially important in much of the project area because it is in the Tennessee Pass linkage. EA at 71. Much of the new habitat created by the project would also not be near denning habitat or even other foraging habitat, further limiting its usefulness to lynx.	All thresholds put forth in the SRLA regarding limitations of acres of treatment in lynx habitat per LAU would be adhered to. See Appendix B of the draft EA – SRLA Analysis pgs. 148-153. As stated in the proposed action, clear cuts are targeted in non-lynx habitat and lower quality lynx habitat (seral lodgepole). Gap openings and uneven aged management would take place closer to higher quality lynx habitat; affording increased foraging in conjunction with the protection of remaining canopy. There would be no treatments in green spruce-fir, lynx primary habitat. Proposals set forth in this project are to meet the purpose and need (Ch. 1 of the EA); and are not solely based on improving lynx habitat.	Lynx
R.Smith3	The proposed clearcutting would not simulate a natural disturbance regime. Lodgepole pine regenerates from stand-replacement fires over large areas. Besides, clearcutting is not like fire, in that fire recycles nutrients while clearcut logging results in removal of soil nutrients from the affected area.	Simulating a natural disturbance regime is not in the purpose and need of this document (Draft EA pg. 9). Clearcutting followed by prescribed burning does allow lodgepole pine to regenerate and also provides for nutrient recycling.	Silviculture
R.Smith4	It would be difficult to close the 21 miles of temporary roads said to be needed for the project. EA at 81, 151. Chances are that some of these areas would get used by recreationists in winter, leading to new areas of compacted snow, which would facilitate access by wildlife that compete with lynx for prey, such as coyote and fox. Roads, clearcuts and thinning would make it easier for snowmobiles to traverse parts of the project area where they do not now go. This would further reduce usable and effective lynx habitat.	See response to S.Johnson13, S.Johnson14 and D.Artley4. Temporary roads will be closed and rehabilitated. Additional information on closing temporary roads has been added to the Final EA.	Lynx

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	The project should be designed to minimize the need for any road construction. Any roads constructed must be obliterated by ripping along the entire length of each and reseeding with native species and /or planted with trees.		
R.Smith5	Under no action, lynx would likely benefit because natural disturbances (bark beetle mortality, fire, maybe windthrow) would lead to regeneration of trees that would eventually form habitat for hare and thus lynx. EA at 75-76. Trees falling down after death would create denning habitat.	The purpose and need of this project is explained in Chapter 1 of the EA. Though lynx could realize benefits from the No Action alternative, the purpose and need of this project would not be met.	Lynx
R.Smith6	Thus little or no vegetation treatment is needed for lynx. But if treatment will be done, a better way to increase hare and lynx habitat would be to create small openings, especially where there are spruce and/or fir trees nearby. These areas might regenerate with lodgepole pine, spruce and/or fir, possibly creating future habitat for hare and lynx. This is contemplated as part of the project. See EA at 22.	This comment has been noted. Chapter 2 of the EA does propose treatments this treatment.	Lynx
R.Smith7	If bark beetle infestation greatly increases, any treatment would not completely eliminate spruce beetles from the project area and adjacent areas because there would be trees outside the project area attacked by the insect. With an average diameter of 8.5 inches (EA at 45), the area is not at high risk of beetles.	Complete elimination of spruce beetle is not proposed for this project. Desired outcomes for salvaging spruce beetle mortality are outlined in the Draft EA Pg. 51.	Silviculture
R.Smith8	Spruce does not regenerate in the open very well, if at all, thus large openings would not regenerate. Therefore, some areas should not be cut to ensure shade for regeneration. Leaving some trees standing, dead or alive, would also help trap snow and retain moisture.	Large openings are not planned for this project. Treatments at Ski Cooper in spruce would be individual and group selection. Salvage cutting would leave all non-infested and non-host trees uncut. Design criteria (Draft EA Pg. 31) specify the minimum number of snags and coarse woody debris (logs) to be left after treatment.	Silviculture
R.Smith9	More than minor cutting would also increase the risk of blowdown. Blown down spruce trees are extremely attractive to spruce beetles. Thus any blowdown could greatly increase spruce beetle infestation, even if many already-infested trees, if any, were removed.	Treatments would be designed to minimize blowdown risk. In addition green Engelmann spruce trees that would blow over after salvage treatments may be removed in coordination with the infested trees (Draft EA Pg. 23).	Silviculture
R.Smith10	The Forest Service proposes to use trap trees to reduce spruce beetles at Ski Cooper. This method can be effective, but it can also exacerbate beetle infestation. To ensure the latter does not occur, every trap tree must be marked and located with GPS and other methods (e.g., direction and distance from nearest ski trail, lift, or	Trap trees would be planned for removal the year following their placement. Locations will be noted with GPS to facilitate later identification. Shaded locations for trap trees are desirable to promote the most attraction for spruce beetles.	Silviculture

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	road) to make sure all of them can be found and treated later when they are full of beetles. Failure to accomplish this means you will have increased the beetle infestation. Trap trees must be located in the shade; otherwise, the down trees would attract *ips* beetles instead of *dendroctonus*, the insect of concern. See Nagel et al, 1957.		
R.Smith11	Spruce trees that are not infested by beetles should not be cut. Mature spruce provide habitat for red squirrel, an important secondary prey for lynx.	Non-infested spruce trees are not proposed for removal except for skid trails, temporary roads or where removal of infested trees would cause significant risk of blowdown occurring in the remaining green trees. (Draft EA Pg.23) Healthy spruce trees would not be cut except for specific conditions outlined in the draft EA pgs. 23-24.	Wildlife Silviculture
R.Smith12	Don't treat winter range while the animals are present. Winter is the most difficult time of year for deer, elk, and other wildlife species. They all need as little disturbance as possible during this time so that they do not unnecessarily expend energy, which would reduce their chances of survival through the winter. The animals need all the winter range they can access, especially since winter range is being developed for residential use. In a cold, snowy winter, where south- and west-facing areas retain snow for some length of time, there may be few places with adequate forage. Under this condition, they may use all the winter range now existing. Species protection measures would not likely prevent all treatment during the snow-free or very low snow season, which usually extends into fall. Raptor young of the year have usually fledged by early September.	See design criteria #19 and 20 on pgs. 33 - 34 of the Draft EA that addresses winter range mitigation. See response to J.Aragon8.	Wildlife
T.Sobel1	There are some positive features of the proposed project that we agree with and support. These include improving wildlife habitat, improving aquatic organism passage, retaining snags and woody debris, appropriate fuel treatment within a very limited corridor of forest/private interface when necessary to help protect existing structures from wildfires, and closing non-system routes and dispersed campsites.	Supportive comment.	Alternative 1
T.Sobel2	The proposed action is significant and warrants required	See response to J.Mellgren26.	NEPA

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	preparation of an environmental impact statement. The Tennessee Creek project presents a number of the significance factors, which individually and cumulatively support the conclusion the Forest Service should prepare an EIS for the Tennessee Creek project. *See attached comment for a list of significance factors.*		
T.Sobel3	The Forest Service must approve a management area for National Forest land along the affected Continental Divide National Scenic Trail (CDNST) and a unit plan for the trail in this area. Proposed treatment of lands near the CDNST must not be allowed until a required management area and unit plan for the trail that passes through the proposed project area are developed. A Unit Plan must be developed for the section to CDNST passing through this analysis area, according to Forest Service policy at FSM 2353.44(b)(2). Also Executive Order (E.O.) 13195 states Federal agencies will protect, connect, promote, and assist trails of all types. The Forest Supervisor has yet to develop a Unit Plan for the sections of the CDNST in the proposed project area. Without a unit plan and management plan, one cannot determine how much land should be included in this area.	PSICC Forest Plan does not have a specific Management Area for the CDNST. However there is Forest Plan Direction for the CDSNT which states for the CDNST: "*All other prescribed direction, standards and guidelines, for the specific management area through which the CDNST passes apply."* The CDNST falls within Management Area 2B-Roaded Natural and has a VQO of Partial Retention. The project is in compliance with the PSICC Forest Plan. Development of the Unit Plan is outside the scope of this project.	CDNST
T.Sobel4	Proposed design criteria do not sufficiently consider and protect all features of the CDNST. The DEA does not provide sufficient consideration of all the CDNST and its management area. Design Criteria #s 41, 42 and 47 on page 37 of the DEA only consider mitigation of potential impacts to visual resources in the CDNST management area. FSH 2353.42 states that the agency must "Administer National Scenic and National Historic Trail corridors to be compatible with the nature and purposes of the corresponding trail. The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. The CDNST specific design criteria in the DEA do not fully consider nor protect yet to be identified natural, historic and cultural	Design Criteria have been established to protect the wildlife, botany, historic, cultural, and scenic resources. The design criteria listed for other resources also apply to aspects of the CDNST; see design criteria #7-30. The CDNST falls within Management Area 2B-Roaded Natural and has a VQO of Partial Retention. The project is in compliance with the PSICC Forest Plan.	CDNST

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	features specifically associated with the CDNST. A high-quality primitive experience is contingent upon experiencing much more than primitive visual resources. Desired primitive experiences could also be negatively impacted by treatment and tree removal in areas beyond that which can be visually seen from the trail by near the trail, and these effects will not be temporary. We think that any of the proposed treatment activities will have a lasting negative impact on desired primitive experiences if visible from the trail.		
T.Sobel5	The DEA may reference the wrong visual quality objective for lands near the CDNST. Design Criteria #47 states that USDA Forest Service. 1974. National Forest Landscape Management Volume 2, Chapter 1: The Visual Management System. Agriculture Handbook # 462. April 1974 was used to determine the Visual Quality Objective for lands near the CDNST. FSM 2353.44b 7 states "Use the Scenery Management System (FSM 2382.1; Landscape Aesthetics: A Handbook for Scenery Management, Agricultural Handbook 701, 1995, http://www.fs.fed.us/cdt) in developing CDNST unit plans and managing scenery along the CDNST.	The CDNST falls within Management Prescription Area 2B-Roaded Natural with a VQO of Partial Retention. The 1974 Visual Management System is the correct reference document based on the current Forest Plan. The Forest Plan takes precedent over manual direction.	CDNST
T.Sobel6	The project does not fully consider potential impacts to lynx and the possibility of designated critical habitat for this species in the project area.	See the effects section 9.0 of the BA (located in the project record) or Chapter 3 of the EA for analysis for lynx. Per the Fish & Wildlife Service, there is no designated critical habitat in the project area (USFWS, 2009) and none proposed in the revised designation proposal (USFWS, 2013).	Lynx
T.Sobel7	The DEA inadequately considers the impacts of the project to adjacent private property values. A final EA/EIS must consider the potential current and future impacts to property values of private lands and homes adjacent to the project area.	Treatments adjacent to subdivisions and private lands would reduce wildfire impacts and risk to the public. The treatments would help improve forest health and reduce the negative impacts from wildfire. Studies show that trees killed by mountain pine beetle, as well as wildfire reduce the value of the property (Price et al., 2010)	Economics
T.Sobel8	The DEA inadequately considers the impacts to designated big	Page 74 of the DEA states how many acres of	Wildlife

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	game winter range. Page 74 of the DEA incorrectly deemphasizes the importance and significance of designated big game winter range in the 5B area on Mt. Zion.	mapped winter range are in the project area and what % of that is winter range for the district and forest. Please see Chapter 2 for design criteria dedicated to mitigating effects to winter range.	
T.Sobel9	The project proposal provides an excellent opportunity to implement management standards documented in the Forest Plan, and properly close the 5B area on Mt. Zion to public motorized use to protect big game. We are concerned that without such restrictions, project treatments on Mt Zion will open up areas to unrestricted snowmobile use that not currently available.	Travel management is outside the scope of this project.	Wildlife; Travel Management
T.Sobel10	The proposed treatments and widening/improvements to FR109 may result in more sun exposure for this road and less snow deposition after wind blocking trees are removed. This may make this route more accessible to wheeled vehicles between December and April.	Under the current Motor Vehicle Use Map, FSR109 is not seasonally closed to vehicles from December through April, though snow loads in the area do limit vehicle traffic.	Roads
T.Sobel11	There are additional winter range areas identified by CPW in the project area that must be considered. These include elk winter range north of FR 103. Moose winter range west of Sylvan Lakes and FR 131.	This comment has been noted. An addendum was written in March 2014 to the Wildlife BE (located in the project record) to include winter range protection for moose. This information was added to the Final EA, Ch. 3 Wildlife section.	Wildlife
T.Sobel12	Impacts to bighorn sheep must be considered in a DEA/EIS. Bighorns remain on the Regional Forest's Sensitive Species list. The EA fails to include an analysis of how the proposed project might impact Bighorn Sheep, and must be modified to include the potential impacts on this species.	This comment has been noted. An addendum was written in March 2014 to the Wildlife BE (located in the project record) to include an analysis for bighorn sheep using the best available science. This information was added to the Final EA, Ch. 3 Wildlife section.	Wildlife
T.Sobel13	Wildlife migration corridor impacts must be considered. With increasing development and use these areas may become unsuitable for wildlife use in the future, and wildlife migration may increasingly shift to forest land within the project boundary.	Assuming this comment is directed to big game and elk in particular, the effects analysis can be found in Chapter 3 of the EA. Effects to species habitats discussion includes areas that may be used for seasonal migration. However, to further clarify impacts to elk migration routes during the winter, an addendum was written in March of 2014 to the BE (found in the project record). This information had been added to Chapter 3 of the Final EA.	Wildlife
T.Sobel14	Proposed treatments should not force wildlife into marginal	Inaccessible does not necessarily mean that wildlife could not access an area. For this project	Wildlife

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	habitat. We question if steep areas, inaccessible areas and wet areas provide the best and highest quality habitat for wildlife.	"inaccessible" was designated if there were private property blocks restricting access or areas too far from main vein roads to effectively be able to "get to" an area. Also, in addition to not treating in steep, inaccessible or wet areas, stands with >35% DHC or spruce-fir stands would also be retained regardless of these other factors. See Chapter 2 of the EA that further specifies reserve areas and refugia.	
T.Sobel15	The proposal must include a more holistic approach to achieving project goals. We can support a decision being made on this project that does not include travel management planning, but are disappointed that dispersed recreation and unauthorized motor vehicle use is not being specifically dealt with in this project.	Outside the scope of this project.	Recreation Travel management
J.Willis1	Log and rock structures are spelled vanes not veins.	Comment has been noted and corrections have been made to the Final EA.	Actions common to all – Halfmoon Creek
J.Wolf1	Please include an appropriate standard to define the distance from the CDNST (and other scenic areas, if appropriate) that these measures are to be applied. As stated in FSM 2353.44b, "the one-half mile foreground viewed from either side of the CDNST route must be a primary consideration in delineating the boundary of a CDNST management area."	Current Forest Plan direction states for the CDNST foreground and middleground, as seen from the trail apply (Forest Plan, pg. III-80). The ½ mile foreground as stated in FSM 2353.44 is for creating a Unit Plan boundary. Creating a Unit Plan is outside the scope of this project.	CDNST
J.Wolf2	To reduce visual impacts, we recommend that the stump height objective be set several inches less than 12 inches. For a high-sensitivity facility such as the CDNST, this would seem to be an appropriate goal.	This comment has been noted. Design criteria have been modified in the Final EA; #42 states, "*Cut stumps 6 – 8 inches from the ground within 100 feet of sensitive scenic areas. Sensitive scenic areas within the project area are: CDNST, Colorado Trail, Top of the Rockies Scenic Byway, and developed recreation sites including campgrounds and day use areas*."	CDNST
J.Wolf3	Unless slash piles are to be removed within a specified period after cutting operations (one year, for example), they should be placed at a greater distance so as not to become a visual intrusion upon the enjoyment of the trail.	No slash piles would be placed within 50 feet for trails, they are temporary in nature, and would be burned once slash is cured and weather conditions permit.	CDNST Visual Impacts
J.Wolf4	We understand that this provision is included so as to provide	Supportive comment.	CDNST, Trails

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	guidance for trails other than the "scenic trails and roadways" that include the CDNST. As such, we agree that this would be desirable.		
J.Wolf5	We suggest that temporary crossings be defined in the contract documents or made subject to Forest approval so that impacts on the sensitive areas are minimized. Also, there should be language that call for repair of damage to trail tread at the end of operations.	All treatments, including temporary crossings, are subject to Forest Service approval prior to implementation. This is included as part of the contract language.	Resource Effects
J.Wolf6	Under FSM 2353.44b, a management area for the CDNST must be developed that is broad enough to protect natural, scenic, historic, and cultural features. As a minimum, we believe there should be a determination, based upon a review of the setting and the specifications for the project, that it does not substantially interfere with the nature and purposes of the CDNST.	The project is in compliance with the PSICC Forest Plan. An addendum has been completed that addresses the CDNST and the information has been added to the Final EA.	CDNST
J.Wolf7	Clear cuts may be particularly undesirable within sight of the CDNST, even where designed in accordance with this provision.	Creating small openings may also result in enhancing the visuals. Design criteria have been modified in the final EA to address treatments adjacent to the CDNST.	CDNST
J.Wolf8	We believe it may be appropriate to include, in the monitoring program, a similar photo survey to measure any persistent adverse impacts upon the CDNST (and other sensitive areas as well, perhaps).	Design and monitoring criteria have been modified in the Final EA to include a Visual Quality Monitor to oversee treatments adjacent to the CDNST. Other monitoring protocols have also been added in the Final EA for the other resources.	Monitoring
J.Wolf9	We suspect that the proposed operations can be scheduled and performed in a manner that will not interfere with through passage along the CDNST (possibly by utilizing nearby existing roads for detour purposes). Otherwise, try to work around the period from June 20 to September 20 (the season during which through-hiking trips here are concentrated).	Snow conditions limit winter treatments and design criteria are in place that restricts operations during other timeframes for the protection of resources such as wildlife.	CDNST
D.Zadra1	Local Lodgepole Stands Demonstrably Resistant to Epidemic Beetle Infestation (SC 1, 7). Vegetative treatment not warranted, a pattern recognized elsewhere (Amman et. Al. 1977, Romme et al 2006)	Scoping comments were reviewed and issues were considered in the development of the proposed action. Recent research (Tishmack and others 2005; Logan and Powell 2001 and 2004) has shown that bark beetles in general are operating successfully and causing widespread mortality at elevations and latitudes that were thought of as low risk in the past (Draft EA Pg. 47). In addition vegetation treatments can reduce the amount of bark beetle mortality in treated stands (Fettig et. al. 2007).	Silviculture

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
D.Zadra2	Elk Would be Severely Impacted by Thinning and Road Construction (SC 4). Proposed thinning throughout the planning area would encumber that evacuation route (presently dense lodgepole stands with minimal snow located west of Tennessee Creek) with open canopy stands characterized by deeper, sun and wind-crusted drifts.	Effects to elk from thinning and temporary road construction are discussed in Chapter 3 of the EA as well as in the effects section (9.0) of the BE. See response to T.Sobel11. The assumption is being made here that what is referred to as "evacuation route" in this comment is what the Forest Service would call "migration corridors".	Wildlife
D.Zadra3	Draft Recognizes that Clearing, Roading Would Adversely Affect Water Quality (p. 120) …yet advocates the management alternative that is the sole justification for clearing/roading, as predicted by my scoping comments (SC 6). Timber clearing and roading are the principal cause of all of this proposal's adverse impacts.	Page 120 of the Draft EA states, "*There would be a pulse of erosion from the use of temporary roads during the first two years following temporary road construction or reopening closed roads. New temporary roads would be closed following use. Project design criteria and BMPs have been developed to minimize the amount of sedimentation produced from activities*." Design criteria and BMPs are in place to reduce impacts. See response to D.Artley4 and D.Artley10.	Water Quality; Resource Effects
D.Zadra4	Draft EA Advocates Extensive Thinning of Dense Lodgepoles to Reduce Fuels, a past practice that has repeatedly led to extensive windthrow (SC 5) thus creating heavy ground fuels.	Scoping comments were reviewed and issues were considered in the development of the project. Thinning treatments would be designed to minimize blowdown through treatment placement and residual basal area targets that take into account exposure to blowdown risk. Draft EA Pg. 15, discusses limiting thinning intensity to reduce blowdown risk.	Silviculture; Resource Effects
D.Zadra5	The NEPA/NFMA mandated public involvement processes were originally to keep USFS management of the public's property in step with the "…needs, values and concerns" of the public. The conspicuous goal of this Draft EA is to conjure public funding for the needs, values and concerns of the Leadville timber management staff. Unfortunately, this practice is not uncommon within the USFS (O'Toole. "Incentives, not Fuels are the Problem". Attached).	This comment has been noted. The literature item was reviewed and considered in this analysis. Factors relevant have been considered in the analysis.	NEPA